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IDAHO DEPARTMENT OF FISH AND GAME
600 S Walnut / P.O. Box 25
Boise, Idaho 83707

C.L. "Butch" Otter / Governor
Virgil Moore / Director

March 4, 2014

U.S. Environmental Protection Agency
Region 10, OWW-130
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Subject: High initial phosphorus sample results for February, 2014

Dear Sir:

I am writing as a representative of the Idaho Department of Fish and Game and the Niagara Springs Fish Hatchery to provide written notice to the U.S. Environmental Protection Agency and the Idaho Department of Environmental Quality that discharge monitoring samples collected February 6, 2014 may reflect phosphorus discharge loading in excess of the maximum instantaneous value allowed in the facility's National Pollutant Discharge Elimination System permit (NPDES Permit No. 130013, effective December 1, 2007). Rangen Research Laboratory notified the hatchery by phone on February 25 that the phosphorus concentration of the February 6 sample was unusually high. On February 28, hatchery staff utilized laboratory results and hatchery water flow data to calculate an instantaneous phosphorus discharge load of 45.4lbs/day. This exceeds the allowable phosphorus discharge load for the first trimester (Jan –Apr) of the calendar year (32.6 lbs/day). My supervisor, Richard Lowell, placed a phone call to your office to report the apparent noncompliance on February 28. While the exact cause for this elevated phosphorus discharge cannot be determined with certainty, we believe it is a function of a change in sampling protocol, and may not represent noncompliance with the permit.

Niagara Springs Fish Hatchery routinely uses automated composite samplers to collect effluent water samples. In December 2013, these samplers were damaged by extreme cold weather and were unavailable at the time of the February 2014 sampling effort. In place of the automated 24-hour composite, a manually collected 8-hour composite was taken on February 6, 2014. The 8-hour composite sample consisted of four discrete aliquots which were collected at two hour intervals during daylight hours. This period represents the most active segment of the day, capturing peak feeding, cleaning, and fish activity, and does not accurately represent the facility's overall effluent water quality during a 24 hour period. Review of the facility's first trimester discharge monitoring results for the past fifteen years shows that we have consistently been within the phosphorus loads stipulated by our permit; all of this data was collected following a 24-hour composite sampling protocol.

Further, the hatchery inventory (lbs of fish) at the time of the February 6, 2014 sample was less than most years on this same date. Based on this information, we believe that the unusually high February 6 phosphorus discharge is a function of the sampling protocol and not an actual change in effluent water quality. The hatchery is in the process of acquiring new automated composite samplers for use beginning in March, 2014. We are confident that this will allow collection of effluent water samples that more accurately represent the operation and the total phosphorus discharge of the facility. Please feel free to contact me if you have any further questions or concerns.

Sincerely,

Jerry Chapman
Hatchery Manager 2
Niagara Springs Hatchery

CC: Mr. Gary Byrne, IDFG
Mr. Richard Lowell, IDFG
Mr. Paul Abbott, IPC
Mr. Craig Thomas, Twin Falls IDEQ
Mr. Brian Thompson, Niagara Springs, IDFG
Mr. Dirk Helder, EPA Boise office